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May 1, 2019

VIA ECF ONLY

Hon. Robert B. Kugler
United States District Court
for the District of New Jersey
U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Hon. Joel Schneider
United States District Court
for the District of New Jersey
U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Re: *In re Valsartan Products Liability Litigation*, No. 1:19-md-02875-RBK-JS (D.N.J.)

Dear Judge Kugler and Magistrate Judge Schneider:

I write to inform your Honors that Plaintiffs and the Mylan defendants have reached agreement on the issue of service on Mylan Laboratories, Ltd. in India.

The parties agree that Plaintiffs will formally serve Mylan Laboratories, Ltd. through the Hague Convention with one complaint of any kind, or one of each type of complaint if the Court so decides. The parties will be submitting briefing today on this other issue. *See* 4/24/19 Hr'g Tr. at 26-27. The Mylan defendants, including Mylan Laboratories, Ltd. in India, will participate in core discovery as directed by the Court without waiting for Hague service to be completed, and without waiver of any objections or defenses including but not limited to jurisdiction.

Accordingly, the parties will not be submitting any briefing today on the issue of service on the Mylan defendants. *See* 4/24/19 Hr'g Tr. at 27.

Respectfully,

Ruben Honik
GOLOMB & HONIK

cc: All Counsel (via ECF)